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**From:** Towle, Michael [Towle.Michael@epa.gov]  
**Sent:** 9/22/2017 5:47:38 PM  
**To:** Towle, Michael [Towle.Michael@epa.gov]  
**Subject:** Fw: Release from transformer at former NVF Property in Kennett Square

FOR EPA FILE

----- Forwarded by Michael Towle/R3/USEPA/US on 09/22/2017 01:47 PM -----

**From:** Michael Towle/R3/USEPA/US  
**To:** "Miller, Rex" <remiller@state.pa.us>,  
**Date:** 03/23/2011 06:51 PM  
**Subject:** Fw: Release from transformer at former NVF Property in Kennett Square

[attachment "Left transformer released.JPG" deleted by Michael Towle/R3/USEPA/US]

[attachment "Affected debris.JPG" deleted by Michael Towle/R3/USEPA/US]

[attachment "Oil moving downhill.JPG" deleted by Michael Towle/R3/USEPA/US]

FYI. I am awaiting information from our PCB crowd, but initial indications are that all may be OK with regards to notifications to EPA.

**From:** "Jessica Zuniga" [jzuniga@dvd.com]  
**Sent:** 03/23/2011 06:20 PM AST  
**To:** Michael Towle; <gbeer@dvd.com>; <jzay@envalliance.com>; <pmiller@envalliance.com>  
**Subject:** RE: Release from transformer at former NVF Property in Kennett Square

Michael:

Prior to addressing your specific requests regarding the release, I would first like to address the issues noted in your email from last summer by updating you on the work we have performed since you were last at the site. Since your previous visit, Paul's group has done a survey of all chemicals and other hazards on the site. Working from that information, we had all of the pipes running from the various tanks cleaned, cut, and capped. During that work, we had all of tanks and their contents evaluated, and are completing the removal of the contents and official closure of the tanks this week. At present, all of the chemicals are removed and their tanks cleaned, and the last of the heating oil tanks are being completed this week.

Additionally, we have performed demolition of two structurally compromised buildings and repaired another. As part

of that work, we removed and disposed of all of the asbestos wrapped pipes, some of which were exposed at the time of your last visit, over the cartway on the eastern side of the property. All of the asbestos that had fallen on the ground or was spread from the fire was also remediated. The asbestos-containing materials in the two demolished buildings were also disposed of in accordance with PADEP's asbestos requirements during the demolition and repair work.

In response to your questions regarding the release:

The date of the release is unknown, but we suspect it was in the middle of the night the day it was discovered. We learned of the release via notification from the Borough's public works department last Friday around 11:30am. Immediately upon being notified, we went to the site and called Paul's team while in route. The release was caused from vandalism. Trespassers that I assume were attempting to find scrap value, removed the spout at the bottom of one of three transformers on a pad to the eastern side of the property. The other two transformers were, and still are, uncompromised. Removal of the spout caused oil to release onto the concrete pad and flow into the paved cartway. Pictures attached. It is important to note that this release is not near any receptors, and even more important to note that prior to starting the demolition work described above, we cut and capped all utilities and closed all drains per request of the Borough.

Mr. Zay's field team immediately responded, making it to the site within two hours of our initial notification. From previous site review, there was no reason to believe these transformers were PCB- containing. However, since testing to confirm had not been performed, Mr. Zay's team treated the situation in the same manner as if it were PCB- containing while we awaited confirmatory testing. The area was cleaned, sampled, and secured as per Mr. Zay's report that was provided to you by PADEP. When we received the confirmatory testing on Monday, Mr. Zay and I discussed the proposed clean-up and agreed on an action plan to include removal of the remaining transformers, breaking up and removal of the pad, and soil excavation and sampling of the affected area to confirm complete removal. Clean-up will also include the disposal of the materials removed during the emergency response work, which is currently contained and secured on-site. All materials will be shipped to an acceptable facility given the PCB concentration. Mr. Zay is preparing a proposal for our approval and we hope to have this work performed as soon as possible.

In the meantime, all three transformers are covered and our nightly security firm has been alerted to the seriousness of the issues concerning this area. They are confirming the tarp remains in place throughout the night with instructions to immediately call should there be a disturbance of this area. Environmental Alliance has been checking and maintaining the tarp each day.

Joe or Paul, I ask that you please fill in the specific testing information gaps that I do not have here.

Please feel free to call or email with any additional information requests.

Thank you,

Jessica D. Zuniga

**From:** Towle.Michael@epamail.epa.gov [mailto:Towle.Michael@epamail.epa.gov]

**Sent:** Wednesday, March 23, 2011 5:08 PM

**To:** gbeer@dvdc.com; jzuniga@dvdc.com; jzay@envalliance.com; pmiller@envalliance.com

**Subject:** Release from transformer at former NVF Property in Kennett Square

George, et. al.

I understand from PADEP that a release of oil containing PCB from at least one transformer occurred at the former NVF Property in Kennett Square. I read an email description of the release prepared by Mr. Zay of Environmental Alliance. I am attaching below my previous summary of the EPA interest and concerns with the subject location. I would greatly appreciate information from DVDC or Environmental Alliance regarding:

- 1) the date of the release
- 2) the date of discovery of the release
- 3) a description of sampling activity, including sampled media, and analytical information regarding the release
- 4) the cause of the release
- 5) steps taken to prevent a further release
- 6) the disposition of contaminated media including materials used to cover the affected area

Thank you for your prompt attention to this matter. It will certainly help to address concerns that may arise

----- Forwarded by Michael Towle/R3/USEPA/US on 03/23/2011 04:59 PM -----

From: Michael Towle/R3/USEPA/US  
To: gbeer@delvaldevco.com  
Cc: pmiller@envalliance.com, codes@kennett.net, tbutterbaugh@state.pa.us, "Payne, Walter" <wpayne@state.pa.us>, Paul Gotthold  
Date: 06/25/2010 10:22 AM  
Subject: NVF Kennett Square June 24

George -

Thank you for facilitating our evaluation of the present conditions at the former NVF facility in Kennett Square on June 24, 2010. As I explained, the U.S. Environmental Protection Agency (EPA) had received information from at least one concerned resident that suggests there are concerns relating to 1) the recent fire, 2) the future property development upon contaminated land, and 3) potential threats posed by the upcoming demolition of the facility. I understand that the fire rubble will soon be addressed and that you intend to address property remediation (and tank closure) through the Pennsylvania Land Recycling process. As such, the focus of my request to evaluate the present conditions deals mainly with the potential for threats to occur to human health and environment during or as a result of the demolition process.

As I also explained, the EPA has conducted and directed response actions relating to PCBs releases from this facility in the past. EPA has also conducted response actions relating to wastes (many from the NVF facility) located at the adjacent Junkyard property. These response actions have contributed to our understanding of the potential for PCBs, including atypical aroclor mixtures not normally detected by standard analytical methods, to be part of the process of circuit board production at the NVF facility. As such, it is possible that certain unknown manufacturing components of the facility may have PCB mixtures within the resins used to produce circuit boards. It was also apparent during our visit of June 24, 2010, and from previous reports, that chemical residuals from NVF's manufacturing process are still present in the piping and the manufacturing equipment at the facility and could pose a threat to workers, nearby residents, and downstream handlers of scrap material alike if not identified, handled and/or addressed appropriately. Although it did appear that large amounts of the interior of the facility were already scrapped and removed, I would suggest that your company complete further work with a better understanding of the potential remaining chemical hazards in the tanks, lines, equipment, and structural components possibly contaminated by chemical releases in the past. I did note that known PCB containing equipment (hydraulic press) possibly regulated by EPA was already removed and may have been removed long before your tenure.

During our evaluation, I suggested that a detailed inventory of the remaining chemical hazards in tanks, drums, equipment, and lines would be helpful for you, the Borough, and future workers to better understand and scope future work. Additionally, such an inventory and a work plan which considers the chemical hazards is the best method to assure that future workers, the nearby residents, and any downstream handler of salvaged material are protected from chemical hazards. Of importance to the overall dismantlement and demolition process would be actions that 1) identify and address any asbestos, 2) identify and address flammable or ignitable or combustible chemicals in tanks and lines,

and 3) identify and address PCB contaminated materials (including the potential for PCBs types not detected in standard analyses). I understand that Delaware Valley Development is preparing to submit demolition plans to the Borough and will be engaging the services of an environmental consultant to advise on appropriate components of the plans relating to chemical hazards. I encourage Delaware Valley Development to consider the potential threats we discussed in these plans.

I may be reached at [Towle.Michael@epa.gov](mailto:Towle.Michael@epa.gov) or at 215-287-2443 for further information.